

EXHIBIT 158



Deposition of:
Robert Blair Thomas

December 16, 2020

In the Matter of:
EIG v. Petrobras

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1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF COLUMBIA

3 -----)

4 EIG ENERGY FUND XIV, L.P.,)

5 et al.,)Case No.

6 Plaintiffs,)1:16-cv-333-APM

7 vs.)

8 PETROLEO BRASILEIRO S.A.,)

9 Defendant.)

10 -----)

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13 REMOTE DEPOSITION OF ROBERT BLAIR THOMAS

14 December 16, 2020

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22 REPORTED BY: Tina Alfaro, RPR, CRR, RMR

1 Q. In what way does it consider those 11:21:28
2 factors? 11:21:30

3 A. Well, we -- a number of ways. First we 11:21:32
4 start with a detailed assessment of -- of the 11:21:40
5 counterparties and the company involved, and 11:21:48
6 there's a threshold question as to whether there 11:21:49
7 are any known red flags, are these people that we 11:21:52
8 would do business with, and if not, then it dies 11:21:55
9 right there. 11:22:00

10 And so as part of that process, you know, 11:22:01
11 we'll frequently speak to -- obviously we have 11:22:05
12 local investment professionals in many of the 11:22:09
13 places that we operate, they're embedded in the 11:22:11
14 investment community, and so they'll have contact 11:22:17
15 and views. We'll talk to local advisors, we'll 11:22:21
16 talk -- we'll engage legal counsel, both local and 11:22:26
17 international. There's a whole series of steps 11:22:30
18 that we'll go through before we get to the point 11:22:32
19 where we're actually making an investment decision. 11:22:40

20 Q. Do you personally have any role in the 11:22:43
21 process you just described with respect to 11:22:46
22 evaluating an investment in terms of risk of 11:22:48

1 unlawful activity or corruption? 11:22:53

2 A. At times if -- you know, oftentimes the 11:22:57

3 senior people at the firm are the people who have 11:23:04

4 the most relationships. So if we want to get an 11:23:06

5 assessment of people, management teams, or 11:23:10

6 companies, it's more likely that the -- you know, 11:23:15

7 the senior people at the firm would -- would know 11:23:20

8 them or know relevant people than junior people. 11:23:24

9 And so early in the process we circulate what's 11:23:27

10 known as a posting memo internally to all the 11:23:30

11 senior people in the firm, and if anybody has any 11:23:33

12 relevant information it would get flagged at that 11:23:40

13 time. 11:23:43

14 And then -- so oftentimes I'm one of those 11:23:46

15 people who has a contact or a relationship or knows 11:23:51

16 something and will -- will weigh in at that time. 11:23:53

17 That posting memo gets discussed on our weekly 11:23:57

18 investment committee meetings. And so all of the 11:24:00

19 investment professionals of the firm gather once a 11:24:04

20 week to discuss, you know, everything that's in the 11:24:08

21 pipeline, and it would -- so that would be the 11:24:10

22 initial screen. 11:24:14